

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ELMAGIN CAPITAL LLC,

Plaintiff,

v.

**CHAO CHEN;
KARL PETTY;
ENTERGRID LLC;
ENTERGRID FUND I LLC**

Defendants.

:
:
:
:
:
:
:
:
:
:
:
:
:
:
:

**CIVIL ACTION NO.:
2:20-cv-02576-TJS**

**PLAINTIFF’S MOTION FOR LEAVE
TO DEPOSE DEFENDANTS’ EXPERT DR. MARIA GARIBOTTI**

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Elmagin Capital LLC (“Plaintiff” or “Elmagin”) moves the Court for leave to depose Defendants’ expert Dr. Maria Garibotti. The bases for Plaintiff’s motion are set forth in the Memorandum filed herewith.

Respectfully Submitted,

Dated: March 24, 2022

/s/ Douglas Panzer

Douglas Panzer (PA Bar ID: 203354)
Manny D. Pokotilow (PA Bar ID: 13310)
Allison R. White (PA Bar ID: 329108)

Caesar Rivise, PC
7 Penn Center, 12th Floor
1635 Market Street
Philadelphia, PA 19103
dpanzer@crbcp.com
mpokotilow@crbcp.com
awhite@crbcp.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2022, a copy of Plaintiff Elmagin Capital, LLC's PLAINTIFF'S MOTION FOR LEAVE TO DEPOSE DEFENDANTS' EXPERT DR. MARIA GARIBOTTI was served on the following via electronic mail:

Nicole D. Galli
Charles P. Goodwin

ND Galli Law LLC
One Liberty Place
1650 Market Street
Suite 3600, #00250
Philadelphia, PA19103
ndgalli@ndgallilaw.com
cgoodwin@ndgallilaw.com

ATTORNEYS FOR DEFENDANTS

By /s/Douglas Panzer